

# **Exhibit 114**

Message

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**From:** Jonathan Sander [JSander@duetgroup.net]  
**Sent:** 3/6/2013 10:02:18 AM  
**To:** Jérôme LHOTE [/O=OEXCH029/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Jlhote@Argre810]; Matthew Stein [/O=OEXCH029/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Mstein@Argre3a2]; John H. van Merkensteijn, III [/O=OEXCH029/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Jhvm@Argrec96]; Adam Larosa [/O=OEXCH029/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Alarosa@Argre6ed]; Richard Markowitz [/O=OEXCH029/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Rmarkowitz@Argrec37]; 'Robert Klugman' [rklugman@storcapital.com]; globalequity [globalequity@duetgroup.net]  
**Subject:** FW: Annex 26

Richard,

Please see below from Freshfields re Belgium.

Regards

Jonathan

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**From:** robert.neyt@freshfields.com [mailto:robert.neyt@freshfields.com]  
**Sent:** Wednesday, March 06, 2013 1:46 PM  
**To:** Jonathan Sander  
**Cc:** globalequity  
**Subject:** RE: Annex 26

Jonathan,

The scope of the exemption (art. 106 RD/ITC) has indeed been reduced. As of January, only Belgian sourced dividends attributed or made payable to foreign pension funds will qualify for the withholding tax exemption. Other non-profits have been excluded.

As a result thereof, some changes have been made to the content of the certificate that needs to be delivered by the beneficiary of the dividend payments in order to benefit from the Belgian withholding tax exemption.

As our advice concerned q US 401A pension fund it still holds after the above modification. The certificate as attached (Annex 26) is correct and reflects the above changes.

Best regards,

Robert Neyt

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**From:** Jonathan Sander [mailto:JSander@duetgroup.net]  
**Sent:** 06 March 2013 08:08  
**To:** NEYT, Robert  
**Cc:** globalequity  
**Subject:** RE: Annex 26

Robert,

Please could you revert this morning as we have a call with the pension plan this afternoon.

Thanks

Jonathan

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**From:** Jonathan Sander  
**Sent:** Tuesday, March 05, 2013 10:06 PM  
**To:** 'robert.neyt@freshfields.com'  
**Subject:** Fw: Annex 26

Robert,

Please see attached the updated Annex 26, effective 1 January 2013. I understand that the Annex was updated owing to the changes in law and dividend entitlements relating to not for profit organisations, other than pension plans.

Can you please confirm that per the updated Annex 26 there are no modifications to the wording relating to beneficial ownership as per the French language version.

Because of the changes to the Annex 26 please can you confirm that your advice issued late last year is still unaffected with regards the US pension plan trading belgian equities and receiving dividends at the preferential rate of 100%.

Thanks

Jonathan  
Jonathan Sander

Duet MENA Limited  
Office 10, Level 4,  
Al Fattan Currency House,  
DIFC,  
P.O Box 482011  
Dubai  
UAE

T: + 971 (0) 4 237 9214  
M: +971 (0) 5065 72263  
+44 (0)7917 447 571

E: [jsander@duetgroup.net](mailto:jsander@duetgroup.net)

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**From:** Sanjeet Manek  
**Sent:** Tuesday, March 05, 2013 05:48 PM GMT Standard Time  
**To:** Jonathan Sander  
**Subject:** Annex 26

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